



Infrastructure, environment, buildings

Mr James Saric  
Remedial Project Manager  
USEPA Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, IL 60604-3507

Subject

Allied Paper, Inc /Portage Creek/Kalamazoo River Superfund Site  
Supplemental Remedial Investigations/Feasibility Studies  
Fourth Semi-Annual Progress Report (August 2008 – January 2009)  
Second Annual Area-Specific Work Report (2008)

Dear Jim,

Attached is the fourth semi-annual progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigations/ Feasibility Studies (SRI/FS). This progress report is submitted as per Section 7.2 of the Statement of Work (SOW) for the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864). Per Section 7.2 of the SOW, the semi-annual progress reports "shall address all areas of the Site where Respondents perform SRI/FS activities and shall summarize overall progress in completing the work required by the AOC and SOW."

As per Section 1.1.1 of the SOW, "for each Area or OU of the Site with ongoing work, including ongoing monitoring and/or operation and maintenance of existing systems, the Respondents shall continue any such ongoing work unless modifications are approved in writing by USEPA. Reporting of any such ongoing work will be in accordance with the Schedule on Exhibit A to this SOW." To meet this requirement, this letter report also includes the second annual Area-specific work reports for Areas 2 through 7. The Master Schedule for the Site, which was submitted in March 2007, states "As appropriate, the annual Area-specific work reports may be included as an element of the Semi-Annual Progress Reports." As stated in Exhibit A, these reports are to be submitted "for each Area, annually until USEPA's approval of an Area-Specific Work Plan for that Area". Because the USEPA approved a work plan for Area 1 as part of the AOC, there is no work report included for Area 1.

ARCADIS

10559 Citation Dr., Suite 100  
Brighton  
Michigan 48116  
Tel 810 229 8594  
Fax 810 229 8837  
www.arcadis-us.com

SEDIMENTS

Date

February 16, 2009

Contact

Michael J. Erickson, P.E.

Phone

810.225.1924

Email

michael.erickson@  
arcadis-us.com

Our ref

B0064539.00014 #2



ARCADIS

Mr. James Saric  
February 16, 2009

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

A handwritten signature in black ink, appearing to read "Michael J. Erickson". The signature is fluid and cursive, with the first name "Michael" and last name "Erickson" clearly distinguishable.

Michael J. Erickson, P.E.  
Associate Vice President

Attachment

Copies

Michael Berkoff, USEPA  
Sam Chummar, USEPA  
Michael Ribordy, USEPA  
Paul Bucholtz, MDEQ  
Jeff Keiser, CH2M HILL  
Todd Goeks, NOAA  
Kathy Huibregtse, RMT Inc.  
J. Michael Davis, Esq., Georgia-Pacific LLC  
Paul Montney, P.E., Georgia-Pacific LLC  
L. Chase Fortenberry, P.G., Georgia-Pacific LLC  
Garry Griffith, P.E., Georgia-Pacific LLC

**SEMI-ANNUAL PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
SRI/FS**

**REPORT #4, AUGUST 2008 TO JANUARY 2009**

**PREPARED BY ARCADIS  
ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)**

**SUBMITTED TO**

**JAMES SARIC, REMEDIAL PROJECT MANAGER  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site SRI/FS**

**REPORT #4, AUGUST 2008 TO JANUARY 2009**

**Areas of the Site where SRI/FS Activities Have Been Performed Pursuant to the AOC and SOW**

- Operable Unit 5 (OU 5) - Kalamazoo River from Morrow Dam to Lake Michigan and Portage Creek from Alcott Street to the confluence

**Summary of Overall Progress in Completing Work Required by the AOC and SOW - Area 1 and Multi-Area**

**AOC Requirements**

- As discussed in Section 28b of the AOC, the United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ) were notified in advance of sample collection activities. Specific notifications are listed below
- The six monthly progress reports generated during the August 2008 to January 2009 period were submitted on time, as required by Section 37 of the AOC and Section 7.1 of the SOW.
- As discussed in Section 48a of the AOC, the validated data that have been generated to date have been submitted as part of the monthly progress reports.

**SOW Requirements**

**Task 1 Project Scoping and SRI/FS Planning Documents**

*Peer Review:*

- On September 1, the Peer Review Panel released the Draft Final Peer Review Consensus Report. On September 25, the Kalamazoo Peer Review Consensus meeting was held in Detroit, MI. A working meeting for the Panel followed on September 26. On December 5, the Peer Review Panel released the *Final Report – Peer Review of MSU's PCB Exposure and Effects Studies in the Floodplain of the Kalamazoo River*. On December 22, the Panel forwarded an addendum to this document entitled "Panel's Comment on the Soil-Earthworm-Shrew PCB Pathway". The Peer Review process is discussed in Section 1.2.1.3 of the SOW.

*Submittals approved by USEPA and finalized.*

- On December 10, USEPA notified ARCADIS that the Phase 2 Sampling Plan for the Portage Creek Sediment Investigation was approved. This sampling is described in Section 3.4.1.3 of the Area 1 SRI Work Plan.

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/  
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**REPORT #4, AUGUST 2008 TO JANUARY 2009**

- On December 10, USEPA notified ARCADIS that the revised SRI Phase 2 River sediment core analyses plan was approved. This sampling is described in Section 3.4.1.1 of the Area 1 SRI Work Plan.
- On December 23, USEPA approved the *Multi-Area Feasibility Study Technical Memorandum: Preliminary List of Possible Applicable and Relevant or Appropriate Requirements* (ARARs Tech Memo). On January 5, ARCADIS submitted the Final ARARs Tech Memo to USEPA. This technical memorandum is discussed in Section 1.2.2.2 of the SOW.
- On January 26, USEPA approved ARCADIS' proposed post-removal sediment sampling locations in the Plainwell Time-Critical Removal Action (TCRA) area. This activity is described in Section 3.4.5 of the Area 1 SRI Work Plan.

*Activities toward completion of other requirements:*

- On August 6, MDEQ provided its comments on the Generalized Conceptual Site Model (CSM) to ARCADIS. On September 25, ARCADIS forwarded to USEPA its responses to USEPA's and MDEQ's comments on the April 2008 CSM along with confirmation of the agreed upon submittal date for the revised CSM. On October 16, ARCADIS submitted to USEPA the revised draft CSM. In November, USEPA and MDEQ forwarded comments to ARCADIS on the October version of the CSM. The CSM is discussed in Section 1.2.1.4 of the SOW.

*Submittals awaiting completion:*

- The Kalamazoo River Study Group (KRSG) awaits USEPA's response to a letter requesting USEPA's data usability determination for existing data for purposes of the SRI/FS, which was submitted to USEPA on August 27, 2007. Data usability is discussed in Section 1.1.2 of the SOW.
- The KRSG awaits USEPA's comments on the remaining two Multi-Area FS documents (Section 1.2.2 of the SOW) and the Candidate Technologies and Testing Needs Technical Memorandum (Section 4.1 of the SOW), which were submitted to USEPA on February 22, 2008.
- The KRSG awaits USEPA's comments on the *Source Investigation at the Former Kalamazoo and Hawthorne Mill Properties* report which was submitted to USEPA on December 1, 2008. This submittal is in compliance with Section 2.2.1.1 of the SOW.
- In February, ARCADIS is scheduled to submit a revised CSM in response to USEPA and MDEQ comments received in November. The CSM is discussed in Section 1.2.1.4 of the SOW.

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**REPORT #4, AUGUST 2008 TO JANUARY 2009**

- In February, ARCADIS is scheduled to submit to USEPA the revised Phase 2 work plan for the Crown Vantage area and the revised Phase 2 work plan for the focused step-out sampling in Area 1. The Crown Vantage sampling is described in Section 3.4.3 of the Area 1 SRI Work Plan. The focused step-out sampling is described in Section 3.4.4 of the Area 1 SRI Work Plan.

**Task 2 Site Characterization**

- In August 2008 through January 2009, ARCADIS collected water column samples every other day at two locations associated with the Plainwell TCRA. This sampling is discussed in Section 3.4.5 of the SRI/FS Work Plan.
- In December, ARCADIS collected and processed the Phase 2 sediment cores in Portage Creek. This sampling is discussed in Section 3.4.1.3 of the Area 1 SRI/FS Work Plan.
- On December 3 and 4, ARCADIS performed the bathymetric monitoring in the Plainwell TCRA area. This activity is described in Section 3.4.5 of the Area 1 SRI Work Plan.
- During the week of December 15, ARCADIS processed and submitted frozen sediment cores for analysis in accordance with the SRI Phase 2 River sediment core analyses plan. The cores were placed into frozen storage in October 2007. This sampling is discussed in Section 3.4.1.1 of the Area 1 SRI/FS Work Plan.
- On January 6, four sediment cores were collected from the river as duplicates of cores collected in Phase 1 sampling at locations KPT 4-2, KPT 5-3, KPT 12-8, and KPT 16-8. These cores were processed and sent to TestAmerica Laboratories, Inc. for analysis as outlined in Section 3.4.1.1 of the Area 1 SRI/FS Work Plan.
- In accordance with Section 2.1 of the SOW, a paper and electronic copy of all laboratory data has been submitted as part of the monthly progress reports.

**Task 3 Remedial Investigation Report (including ecological and human health risk assessment)**

- No meetings, submittals, or notifications

**Task 4 Treatability Studies (if needed)**

- No meetings, submittals, or notifications.

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/  
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**REPORT #4, AUGUST 2008 TO JANUARY 2009**

**Task 5. Development of Screening Alternatives (Technical Memorandum)**

- No meetings, submittals, or notifications.

**Task 6. Detailed Analysis of Alternatives (FS Report)**

- No meetings, submittals, or notifications.

**Task 7. Progress Reports**

- The six monthly progress reports generated during the August 2008 to January 2009 period were *submitted on time, as required by Section 7.1 of the SOW*
- The third semi-annual progress report for Area 1 was submitted to USEPA as required by Section 7.2 of the SOW

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/  
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**REPORT #4, AUGUST 2008 TO JANUARY 2009**

**ANNUAL AREA-SPECIFIC WORK REPORTS (AREAS 2 THROUGH 7)**

**Summary of Overall Progress in Completing Work Required by the AOC and SOW**

**Area 2**

- In November, ARCADIS collected yearling smallmouth bass in the Otsego City Impoundment to assess effects of the Plainwell TCRA. This sampling is discussed in Section 3 4 5 of the Area 1 SRI/FS Work Plan. As discussed in Section 28b of the AOC, the USEPA and MDEQ were notified in advance of sample collection activities.

**Summary of Overall Progress in Completing Work Required by the AOC and SOW**

**Areas 3 through 7**

- No AOC-required or SOW-required work was performed in Areas 3 through 7 between August 2008 and January 2009.